

1 Miles N. Clark, Esq.  
2 Nevada Bar No. 13848  
3 KNEPPER & CLARK LLC  
4 5510 So. Fort Apache Rd, Suite 30  
5 Las Vegas, NV 89148  
6 Phone: (702) 856-7430  
7 Fax: (702) 447-8048  
8 Email: miles.clark@knepperclark.com

6 David H. Krieger, Esq.  
7 Nevada Bar No. 9086  
8 KRIEGER LAW GROUP, LLC  
9 2850 W. Horizon Ridge Parkway, Suite 200  
10 Henderson, NV 89052  
11 Phone: (702) 848-3855, Ext. 101  
12 Email: dkrieger@kriegerlawgroup.com

10 *Counsel for Plaintiff*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

14 LEISA WHITTUM,

15 Plaintiff,

16 v.

17 UNIVERSITY MEDICAL CENTER OF  
18 SOUTHERN NEVADA,

19 Defendants.

Case No. 2:21-cv-01777-JAD-EJY

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFF TO FILE MOTION  
TO REMAND**

**[FIRST REQUEST]**

Complaint filed:

20 Plaintiff Leisa Whittum (“Plaintiff”), by and through her counsel of record, and Defendant  
21 University Medical Center Of Southern Nevada (“UMC”) have agreed and stipulated to the  
22 following:  
23

24 **1.** On September 24, 2021, UMC filed a Petition for Removal removing the case from  
25 District Court, Clark County, Nevada [Dkt. 1].

26 **2.** Plaintiff’s Motion to Remand is due October 22, 2021.  
27  
28

Plaintiff and UMC have agreed to extend Plaintiff's motion deadline seven days in order to allow Plaintiff to consider the facts and circumstances of the pending briefing, and to extend UMC's deadline to file a reply in support of its petition for fourteen days for the same reasons. As a result, both Plaintiff and UMC hereby request this Court to further extend the date for Plaintiff to file her Motion to Remand until **October 29, 2021**, and to extend the date for UMC to file their response to Plaintiff's motion to remand until **November 11, 2021**. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose

**IT IS SO STIPULATED.**

Dated October 22, 2021

<b>KNEPPER &amp; CLARK LLC</b> <u>/s/ Miles N. Clark</u> Miles N. Clark, Esq. Nevada Bar No. 13848 5510 So. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Email: miles.clark@knepperclark.com  <b>KRIEGER LAW GROUP, LLC</b> David H. Krieger, Esq., SBN 9086 2850 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052 Email: dkrieger@kriegerlawgroup.com  <i>Counsel for Plaintiff</i>	<b>KOELLER, NEBEKER, CARLSON &amp; HALUCK, LLP</b> <u>/s/ Mark F. Roach</u> Mark F. Roach, Esq. Nevada Bar No. 8237 Andrew C. Green, Esq. Nevada Bar No. 9399 400 S. 4th Street, Suite 600 Las Vegas, NV 89101 Email: Andrew.green@knchlaw.com Email: Mark.Roach@knchlaw.com  <i>Counsel for Defendant</i> <i>University of Medical Center of Southern Nevada</i>
---	---

**ORDER GRANTING**  
**STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE MOTION TO**  
**REMAND AND FOR DEFENDANT TO FILE RESPONSE TO PLAINTIFF'S MOTION**  
**TO REMAND**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: **October 22, 2021**